

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BIENVENIDO I. LUGO MARCHANT,  
Plaintiff,

v.

PETER TSICKRITZIS, KEVIN KINGSTON  
and UNITED LIQUORS LIMITED,  
Defendants.

Civil Action No. 05 11317 NMG

**RESPONSE TO PLAINTIFF'S MOTION TO DISBAR COUNSEL**

On September 6, 2007, Plaintiff, Bienvenido I. Lugo Marchant, served a "Motion To Disbar and Prevent Joan Ackerstein, Esq., From Practicing Law For Her Reproachable Behavior." This is to respond to that motion.

As a preliminary matter, Plaintiff failed to comply with Local Rule 7.1 which requires that parties confer prior to filing motions. This motion should be summarily dismissed for that reason.

More significantly, Plaintiff's motion consists of a series of false and malicious, unverified and unsupported allegations against both one of the individual defendants and Defendants' counsel. Furthermore, since Plaintiff's allegations regarding counsel's conduct in her automobile are absurd, the reference to counsel's automobile can only be an attempt to intimidate. Plaintiff should not be permitted to proceed in this manner, flaunting the rules of civil procedure in the process.

For the foregoing reasons, Defendants respectfully request that the motion be denied.

Respectfully submitted,

UNITED LIQUORS LIMITED, PETER  
TSICKRITZIS and KEVIN KINGSTON,

/s/ Joan Ackerstein

Joan Ackerstein (BBO# 348220)

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Dated: September 17, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2007, this document was served upon Plaintiff, Bienvenido I. Lugo Marchant, 19 Grove Street, Brockton, MA 02301, by first class mail, postage prepaid.

/s/ Joan Ackerstein

Jackson Lewis LLP